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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: VOLKSWAGEN “CLEAN DIESEL”
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2672 CRB (JSC)

Hon. Charles R. Breyer

THIS DOCUMENT RELATES TO:

**NOTICE OF ERRATA TO
DECLARATION OF STEVE B. MIKHOV
IN SUPPORT OF PLAINTIFFS’ MOTION
FOR ATTORNEYS’ FEES**

*Angulo-Zevallos v. VWGoA, et al., 17-cv-
02303-CRB*

*Cacciatore, et al. v. VWGoA, et al., 17-cv-
01278-CRB*

*Carlson, et al. v. VWGoA, et al., 18-cv-06949-
CRB*

*Carballar, et al. v. VWGoA, et al., 17-cv-
01177-CRB*

Chavez v. PCNA, et al., 3:17-cv-07260-CRB

*Cooper, et al. v. VWGoA, et al., 17-cv-01181-
CRB*

*Covey, et al. v. VWGoA Inc., et al., 18-cv-
06950-CRB*

Cunneen v. VWGoA, et al., 18-cv-07183-CRB

Dixon v. VWGoA, et al., 17-cv-03360-CRB

Date: September 11, 2020

Time: 10:00 a.m.

Courtroom: 6

1 *Estenssoro v. VWGoA, et al., 17-cv-02118-CRB*
 2 *Estenssoro v. VWGoA, et al., 17-cv-02724-CRB*
 3 *Frech v. VWGoA, et al., 17-cv-04250-CRB*
 4 *Grundman et al., v. VWGoA, et al., 18-cv-06984-CRB*
 5 *Hark v. VWGoA, et al., 16-cv-05868-CRB*
 6 *Hartman v. VWGoA, et al., 18-cv-07184-CRB*
 7 *Herbert v. VWGoA, et al., 18-cv-06971-CRB*
 8 *Herriott, et al. v. VWGoA, et al., 17-cv-00266-CRB*
 9 *Hightower v. VWGoA, et al., 17-cv-03369-CRB*
 10 *Janowicz, et al. v. VWGoA, et al., 17-cv-03153-CRB*
 11 *Johnson v. VWGoA, et al., 17-cv-03429-CRB*
 12 *Jung v. VWGoA, et al., 18-cv-06979-CRB*
 13 *Kelsey v. VWGoA, et al., 17-cv-03147-CRB*
 14 *Kunze v. VWGoA, et al., 17-cv-03430-CRB*
 15 *Laub v. VWGoA, et al., 17-cv-04512-CRB*
 16 *McDermott v. VWGoA et al., 17-cv-04251-CRB*
 17 *McKasson v. VWGoA, et al., 17-cv-04625-CRB*
 18 *Mitchell, et al. v. VWGoA, et al., 17-cv-02850-CRB*
 19 *Montes v. VWGoA, et al., 17-cv-00729-CRB*
 20 *Morehouse v. VWGoA, et al., 17-cv-02140-CRB*
 21 *Nesson v. VWGoA, et al., 17-cv-00265-CRB*
 22 *Pantoja v. VWGoA, et al., 17-cv-02305-CRB*
 23 *Pasqua, et al. v. VWGoA, et al., 17-cv-01659-CRB*
 24 *Pires v. VWGoA, et al., 17-cv-01957-CRB*
 25 *Powers v. VWGoA et al., 17-cv-00880-CRB*
 26 *Redman v. VWGoA, et al., 17-cv-01196-CRB*
 27 *Restine v. VWGoA, et al., 18-cv-06980-CRB*
 28 *Reyes v. VWGoA, et al., 17-cv-00731-CRB*
Rios, et al. v. VWGoA, et al., 17-cv-02417-CRB
Rodriguez v. VWGoA, et al., 18-cv-06981-CRB
Sadeghi v. VWGoA, et al., 17-cv-04348-CRB
Shepherd v. VWGoA, et al., 17-cv-02419-CRB
Suh v. VWGoA, et al., 18-cv-06982-CRB
Sushko v. VWGoA, et al., 17-cv-01207-CRB
Tang v. VWGoA, et al., 18-cv-07188-CRB
Tolle v. VWGoA, et al., 17-cv-02139-CRB

1 *Trane, et al. v. VWGoA, et al., 17-cv-04252-*
2 *CRB*
3 *Walsh, et al. v. VWGoA, et al., 17-cv-03376-*
4 *CRB*
5 *Waltman v. VWGoA, et al., 17-cv-03445-CRB*
6 *Waymire, et al. v. VWGoA, et al., 17-cv-01179-*
7 *CRB*
8 *Weiss, et al. v. VWGoA, et al., 17-cv-02412-*
9 *CRB*
10 *Zagheri v. VWGoA, et al., 17-cv-01667-CRB*
11 *Zuno v. VWGoA, et al., 18-cv-06983-CRB*

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14 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

15 **PLEASE TAKE NOTICE** that as a result of inadvertent error, the Declaration of Steve
16 B. Mikhov in Support of Plaintiffs' Motion for Attorney's Fees ("Declaration"), filed with the
17 Court on August 5, 2020, included erroneous amounts for attorney's fees requests.

18 On Line 17 of Page 2 of the Declaration, Plaintiffs correct the lodestar attorneys' fees
19 amount from \$420,245.93 to **\$1,094,395.39**.

20 On Line 19 of Page 2 of the Declaration, Plaintiffs correct the lodestar attorneys' fees
21 amount for 52/60th of Knight Law's general MDL bill from \$300,263.00 to **\$260,227.93**.

22 On Line 23 of Page 2 of the Declaration, Plaintiffs correct the Exhibit B reference from
23 "B-51" to **"B-52."**

24 **PLEASE TAKE FURTHER NOTICE** that Exhibit B of the Declaration contained a chart
25 which erroneously included common costs with common fees. Plaintiffs attach the corrected chart.

26 **PLEASE TAKE FURTHER NOTICE** that Exhibit B of the Declaration erroneously
27 omitted a table containing exhibit numbers for each case. Plaintiffs attach the omitted table.
28

1 All other information contained in the Declaration is correct and remains unchanged. The
2 corrected Declaration is attached hereto as **Exhibit A**.

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4 Date: August 14, 2020

KNIGHT LAW GROUP, LLP

5
6 /s/Roger Kirnos

7 Steve Mikhov (SBN 224676)

8 Roger Kirnos (SBN 283163)

9 Attorneys for Plaintiffs
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